

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

In re: )  
 )  
LTL MANAGEMENT LLC, ) Lead BK Case: 23-12825-MBK  
 )  
Debtor. )

**AD HOC GROUP OF MESOTHELIOMA CLAIMANTS' JOINDER TO MOTION TO  
DISMISS THE SECOND BANKRUPTCY PETITION OF LTL MANAGEMENT AND  
REPLY IN SUPPORT OF MOTION FILED BY THE OFFICIAL COMMITTEE OF  
TALC CLAIMANTS**

The Ad Hoc Group of Mesothelioma Claimants,<sup>1</sup> through undersigned counsel and pursuant to Section 1112(b) of the Bankruptcy Code and Rule 9011 of the Bankruptcy Rules, respectfully moves this Court to Dismiss LTL Management's Petition. In the interests of judicial economy, the Ad Hoc Group adopts and hereby incorporates by reference all arguments and evidence contained in the Motion to Dismiss filed by the Official Committee of Talc Claimants (Dkt. 286) and its Reply (to be filed).

Respectfully submitted:

**MAUNE RAICHLE HARTLEY  
FRENCH & MUDD, LLC**

*/s/ Clayton L. Thompson*

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Clayton L. Thompson, Esq.

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<sup>1</sup> The Ad Hoc Group is composed of claimants Katherine Tollefson, Evan Plotkin and Giovanni Sosa (all appellants to the Third Circuit in *LTL1*), joined in this Request by Sandra Weathers, Mary Jackson, Elizabeth Meikle, Marzena Zachara, Robert Radin, and Christine Woodfin, all mesothelioma claimants.

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**COONEY & CONWAY**

/s/ *Kathy Byrne*

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**LEX NOVA LAW, LLC**

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